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Dedicated to protecting and improving the health and environment of the people of Colorado

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Colorado Department
of Public Health
and Environment

July 1, 1994

Mr. Steven W. Slaten
U.S. Department of Energy
Rocky Flats Office
P.O. Box 928
Golden, Colorado 80402-0928

RE. Technical Memorandum/Revised Work Plan - OU7

Dear Mr. Slaten,

The Colorado Department of Public Health and Environment, Hazardous Materials and Waste Management Division (the Division), has reviewed the above referenced document and is providing the attached comments. As the lead regulatory agency for OU7, we have assembled consolidated comments and are providing them without editing to DOE. Division comments must be addressed in the final submittal. Comments submitted by EPA must be addressed to the satisfaction of the Division.

The Division has found both the Technical Memorandum portion, containing the results of the Phase I RFI/RI fieldwork, and the Revised Work Plan, proposing field work to satisfy Phase II RFI/RI objectives, to be sufficiently lacking in technical merit and strategic planning to not allow approval of this draft version. Substantive comments from the Division, EPA, and its subcontractor detail the document's shortcomings.

Changes to the Revised Work Plan are likely to be resolved more quickly and easily than the sections containing the results of the Phase I RFI/RI. We are willing to split the final approvals of the entire document to separate the Sampling and Analysis Plan from the Phase I Report. This will allow DOE to begin approved fieldwork this season while the Phase I Report is being concurrently revised.

Meetings among DOE, EG&G, EPA, and CDH staff have already been scheduled to resolve agency comments. Although the comments are extensive, we do not feel their resolution should adversely impact the implementation of the Process Improvement Proposal; all parties have informally agreed to IAG milestones related to the OU7 closure still need to be settled among the parties.

If you have any questions regarding these matters, please call Dave Norbury of my staff at 692-3415.

Sincerely,

Joe Schieffelin, Unit Leader
Rocky Flats IAG Unit
Hazardous Waste Control Program

cc Arturo Duran, EPA
Jen Pepe, DOE
Laurie Peterson-Wright, EG&G
Laura Perrault, AGO
Steve Tarlton, RFPU

ADMIN RECORD

A-OU07-000203